

UNITED STATES OF AMERICA DISTRICT COURT OF NEW JERSEY

Dr. Beverly M. Harris,

Plaintiff,

v.

Mr. Thomas S. Bozzuto, Founder of the Bozzuto Group,
6406 Ivy Lane #700 Greenbelt, Maryland 20770,

Mr. Toby Bozzuto, Operating Officer, Bozzuto Group,
6406 Ivy Lane #700 Greenbelt, Maryland 20770, &
Partners of the Bozzuto Group, 6406 Ivy Lane #700
Greenbelt, Maryland 20770,

Mr. David Curcio, Regional Manager, 6406 Ivy Lane #700
Greenbelt, Maryland 20770,

Ms. Michelle Demetriou, Manager The Park Apartments,
471 Raritan Road, Roselle New Jersey

U.S. ATTORNEY GENERAL, Jeffery Sessions, in his
individual and official capacities, US Department of
Justice, 950 Pennsylvania Avenue, NW, Washington, DC
20530,

DIRECTOR, Christopher A. Wray, FEDERAL BUREAU
OF INVESTIGATION, J. Edgar Hoover Building, 935
Pennsylvania Avenue, NW, Washington, DC 20535,

AN UNKNOWN NUMBER OF UNKNOWN AGENTS
OF FEDERAL BUREAU OF INVESTIGATION, 611
Greenway Blvd, The Park Apartment, Roselle, New Jersey
07203,

AN UNKNOWN NUMBER OF UNKNOWN AGENTS
OF FEDERAL BUREAU OF INVESTIGATION, 11
Centre Pl, Newark, NJ 07102,

AN UNKNOWN NUMBER OF UNKNOWN AGENTS
OF FEDERAL BUREAU OF INVESTIGATION,
addresses Unknown,

Defendants.

CASE NO.: 2:18-CV-10277-MCA-SCM

JUDGES: Judge Madeline Cox Arleo

Magistrate Judge Steven C. Mannion

**DEFENDANTS' MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION
AND FOR FRIVOLOUS AND MALICIOUS ACTION AND FOR FAILURE TO STATE A CLAIM
UPON WHICH RELIEF MAY BE GRANTED, AND TO CONTEST SERVICE**

CERTIFICATION OF DAVID CURCIO

David Curcio, hereby certifies as follows:

1. Service in this matter was attempted by leaving a single summons at the apartment in New Jersey where Plaintiff resided (she has since left), made out to: Partners of the "Bozzuto Operating Officer" with an address of 6406 Ivy Lane, #700, Greenbelt, Maryland 20770.
2. The only person who works there and has an office there is Michelle Demitriou, (she has since left the company) and she is not a "Partner of the Bozzuto Operating Officer".
3. To resolve the statement, asked as a question in the Complaint (Paragraphs 19 and 82), Michelle Demitriou (formerly Gallagher) was at all relevant times, a licensed sales person with the New Jersey Real Estate Commission. Attached as Exhibit A is a copy of her license.
4. Michelle Demitriou and I are New Jersey residents and citizens. Thomas S. Bozzuto and Toby Bozzuto are residents and citizens of Maryland. I have known all of these individuals for years and can attest to their places of domicile. Because of the peculiar nature of the allegations of this Plaintiff, I have intentionally been less specific about the actual locations of domicile in each of those states.
5. Plaintiff moved out of her apartment voluntarily, within the past two weeks.

I certify that the foregoing statements made by me are true. I understand that if any statements made herein are willfully false, I am subject to punishment.

Dated: 9/17/18

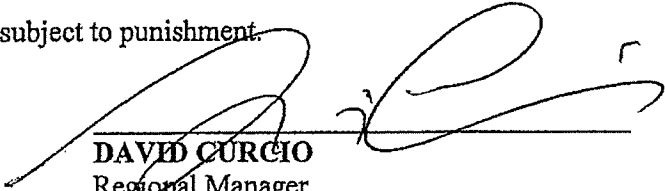

DAVID CURCIO
Regional Manager
The Bozzuto Group

EXHIBIT A

NEW JERSEY DEPARTMENT OF BANKING AND INSURANCE
NEW JERSEY REAL ESTATE COMMISSION
LICENSE AND IDENTIFICATION CARD

ISSUED TO: GALLAGHER, MICHELLE

REF NO.: 1541227 LIC. TYPE: SALESPERSON

LICENSED WITH: THOMAS L BISANZ

REF NO.: 1223276 LIC. TYPE: SOLE PROPRIETORSHIP

EXPIRATION: JUN 30, 2019 CREATED: FEB 05, 2018

THIS CARD MUST BE CARRIED BY THE LICENSEE WHENEVER ENGAGED IN BROKERAGE ACTIVITY.
THE INFORMATION ON THIS CARD IS ACCURATE AS OF THE DATE CREATED.
FOR MORE DETAILED INFORMATION, GO TO DOBILICENSING.NJ.GOV

NEW JERSEY DEPARTMENT OF BANKING AND INSURANCE -- MARLENE CARIDE, ACTING COMMISSIONER
NEW JERSEY REAL ESTATE COMMISSION -- PATRICK J. MULLEN, DIRECTOR OF BANKING